Public Comment: Submitted during special comment period relating to FY 2022 ACO Budget Guidance.

Name: Caleb Abetti

Date: 6/11/21

Topic: Accountable Care Organization

Comment: Would the board please explain clearly in the ACO Certification documents what arises to probable violation of law reporting requirement. For instance, does the current litigation by the Attorney General amount to a probable violation? Would any other litigation similarly meet the standard of probable violation of law?